

In the Matter of the Commission, on its own motion, to conduct an investigation into possible solutions for extending the life of area codes 308 and 402

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Introduction

A. My name is Jack Robertshaw. I am employed by N.E. Colorado Cellular, Inc., d/b/a Viaero Wireless ("Viaero") as Network Interconnect Manager. My business address is 1512 South Locust, Grand Island, Nebraska. On behalf of Viaero, I'd like to thank the Nebraska Public Service Commission (the "Commission") for the opportunity to participate in this important hearing as the Commission seeks ways to promote number conservation in the wake of the Federal Communications Commission ("FCC") order granting it authority to implement mandatory thousand-block pooling in the 402 NPA.¹

A. Viaero is a commercial mobile radio service (“CMRS”) provider licensed by the FCC. We acquired our first FCC license in Colorado over 15 years ago, and over the past five years we have acquired additional spectrum to expand our network into Nebraska. We are licensed to serve the western two-thirds of the state. Viaero is focused primarily on serving consumers in rural areas and takes pride in providing superior coverage,

¹ *Numbering Resource Optimization*, Order and Fifth Notice of Proposed Rulemaking, CC Docket No. 99-200 (the “FCC Order”).

anytime access, immediate customer service, competitive products, and seamless connectivity, so that rural consumers can have quality wireless communications on par with urban areas.

Q. WHY HAS VIAERO CHOSEN TO PARTICIPATE IN THIS PROCEEDING?

A. Viaero has been one of the leaders in number conservation in this state. As part of Viaero's commitment to provide seamless coverage in rural Nebraska and provide the services rural Nebraska customers require, Viaero attempts to provide local numbers wherever possible. Within the last two years, Viaero has utilized pooled number resources in 17 rate centers that support pooling. In rate centers without pooling capabilities we have applied for seven full NXX codes. Without pooling resources, we would have consumed 17 more full office codes, further depleting our number resources.

We believe it is essential to view numbers as a national resource, not something owned by carriers. As such, they need to be utilized like any inventory, and managed so that resources are available when required. With the rapid pace at which new technologies are being developed, numbers are the universal resource that everyone needs; waiting for the availability of that resource is not an option. The FCC Order provided the Commission with an opportunity to ensure that numbering resources are available as competition develops across Nebraska. The Commission's order dated March 14, 2006, took the important step of designating rate centers served within the 402 NPA that are served by Frontier, Qwest and ALLTEL for mandatory thousands-block pooling.

Q. WHAT SHOULD THE TIMELINE BE FOR MANDATORY POOLING IN THE REMAINING RATE CENTERS IN THE 402 NPA?

A. Mandatory thousands-block pooling should be implemented as quickly as possible in all of the remaining rate centers in that NPA. We therefore support the schedule proposed in Progression Order #1. It is a proven fact that thousands-block number pooling leads to far more efficient number utilization by carriers. As a rural service provider, we require efficient and timely access to numbering assets. Not having access to pooled resources in these rural areas hinders our ability to provide service to consumers, which is doubly important given our federal universal service obligations as an eligible telecommunications carrier ("ETC") designated by this Commission. Excessive duplicate allocation of new office codes during our statewide build-out will only worsen the numbering situation in the 402 area code. Therefore, I strongly believe the Commission should implement pooling in those areas on an expedited basis. We know of no reason why the incumbent carriers serving those rate centers cannot comply in a timely manner, given the FCC's finding, at paragraph 11 of the FCC Order, that "for carriers who are required to participate in number pooling, full LNP capability is not required."

Q. IF CARRIERS SEEK TO DELAY OR POSTPONE IMPLEMENTATION OF POOLING BECAUSE OF COST, WHAT SHOULD THE COMMISSION'S RESPONSE BE?

A. If a carrier has failed to make the upgrades necessary to support queries to the national pooling database, the Commission should ask what was accomplished with the USF and NUSF funding that carrier has received over the years. Each year, this Commission and the FCC rely on certifications attesting to the use of state and federal universal service support for the purpose of not only maintaining networks, but also

performing the necessary upgrades to ensure that rural consumers have access to a selection and level of quality of telecommunications service that is comparable to that in urban areas. It is difficult to understand why a carrier that has long benefited from these subsidies would not be able to make the necessary changes quickly if it hasn't already done so. I emphasize that this is not a competitive issue, but a resource issue, and if carriers do not choose or wish to comply, they can simply return their excess numbers.

Q. WHAT POOLING METHOD SHOULD BE USED?

A. Thousands-block pooling should be implemented using a dip and query to the national pooling database to obtain the routing LRN and calls routed using the LRN. The Commission should reject the use of "translations routing" of 1000 blocks. By routing the 1000 block using translations if numbers are ported (wireless to wireless port) the default carrier will be responsible to do the LNP query and reroute a ported call to another carrier. Thus, as the default carrier, we are unfairly placed into a transporting position and responsible for the correct routing utilizing our facilities for another company's customer.

Q. WHAT OTHER CONSIDERATIONS SHOULD THE COMMISSION BE AWARE OF AS IT IMPLEMENTS POOLING?

A. It will be crucial that ILECs be required to load numbers into their switches in response to requests by competitive carriers on reasonable terms. Viaero has had difficulties with ILECs that have refused to load numbers – which means that a wireline customer can't call Viaero's customer as a local call. Again, I must emphasize that numbers should be considered a national resource and cannot be hoarded by particular carriers. If the Commission puts measures into place to require incumbents to load

numbers upon request and upon reasonable terms, this will be a critical step in promoting number conservation and removing obstacles to competition.

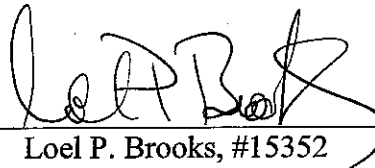
Q. DOES THAT CONCLUDE YOUR TESTIMONY?

A. Yes.

Respectfully submitted this 22nd day of May, 2006.

N.E. COLORADO CELLULAR, INC.,
d/b/a VIAERO WIRELESS

By



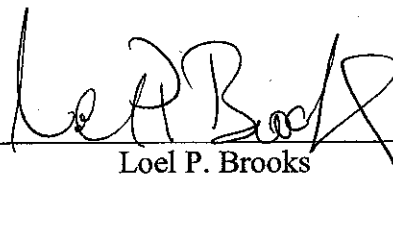
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 22nd day of May, 2006, an original, eight copies and an electronic copy of the Testimony of Jack Robertshaw on Behalf of Viaero Wireless in Application No. C-3049 were hand delivered to:

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